



(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER: Not applicable.**

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related such that they should be assigned to a single judge will be determined by the Clerk of Court based on determination of whether the cases; arise from the same or identical transaction, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER: No.**

(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER: Bishop of Charleston, a Corporation Sole is properly identified. The ecclesiastical office “the Bishop of the Diocese of Charleston, in his official capacity” is not properly named as a party defendant.**

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**ANSWER: Defendants are not aware of any other person or legal entity that may be liable in whole or in part at this time.**

TURNER, PADGET, GRAHAM & LANEY, P.A.

s/Richard S. Dukes, Jr.

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ATTORNEYS FOR DEFENDANTS

April 1, 2022  
Charleston, South Carolina